

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

TOPIA TECHNOLOGY, INC.,

Plaintiff,

v.

DROPBOX, INC., SAILPOINT  
TECHNOLOGIES HOLDINGS, INC., and  
CLEAR CHANNEL OUTDOOR  
HOLDINGS, INC.,

Defendants.

Case No. 6:21-cv-1373-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF ANDREW N. SAUL REGARDING DEFENDANTS SAILPOINT  
AND CLEAR CHANNEL'S OPPOSED MOTION TO SEVER AND STAY UNDER THE  
"CUSTOMER-SUIT" DOCTRINE**

1. I am an attorney and a member of the State Bar of Georgia. I am an Associate with Kilpatrick Townsend & Stockton LLP and counsel of record for Defendant SailPoint Technologies Holdings, Inc. in this litigation. I am over the age of 18 and competent to make this declaration.

2. I make this declaration on my own knowledge. If called upon to testify regarding the contents of this declaration, I could and would competently testify to its accuracy.

3. Attached as Exhibit 1 is a true and correct copy of Plaintiff Topia Technology, Inc.'s Disclosure of Preliminary Infringement Contentions and Accompanying Document Production, served April 28, 2022.

4. Attached as Exhibit 2 is a true and correct copy of Plaintiff Topia Technology, Inc.'s Amended Disclosure of Preliminary Infringement Contentions and Accompanying Document Production, served July 7, 2022.

5. Attached as Exhibit 3 is a true and correct copy of Exhibit A to Plaintiff Topia Technology, Inc.'s Amended Disclosure of Preliminary Infringement Contentions and Accompanying Document Production, served July 7, 2022.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 25, 2022, in Atlanta, Georgia.

/s/ Andrew N. Saul

Andrew N. Saul

**CERTIFICATE OF SERVICE**

I hereby certify that on the date below all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing via the Court's CM/ECF system.

Dated: July 25, 2022

/s/ Andrew N. Saul  
Andrew N. Saul